

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
REBECCA LEVY
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Rebecca_Levy@fd.org
6

7 Attorney for Jimmy Carter Kim

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JIMMY CARTER KIM,
15 Defendant.
16

Case No. 2:18-mj-836-DJA

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Ninth Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between
18 Nicholas A. Trutanich, United States Attorney, and Christopher Burton, Assistant United States
19 Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public
20 Defender, and Rebecca Levy, Assistant Federal Public Defender, counsel for Jimmy Kim, that
21 the Preliminary Hearing currently scheduled on March 27, 2020 at 4:00 pm, be vacated and
22 continued to a date and time convenient to the Court, but no sooner than ninety (90) days.

23 This Stipulation is entered into for the following reasons:

24 1. In light of the recent events surrounding the COVID-19 pandemic and the Center
25 for Disease Control's guidelines recommending social distancing from others when possible of
26

1 approximately 6 feet, undersigned counsels request a continuance to allow time to meet with
2 their clients to discuss the case and to further decide how to best proceed with the case

3 2. The parties require additional time to discuss the potential for Pre-Indictment
4 negotiations.

5 3. Counsel for the defendant needs additional time to conduct investigation in this
6 for case in order to determine whether there are any issues that must be litigated prior to a
7 preliminary hearing and whether the case will ultimately go to preliminary hearing or will be
8 resolved through negotiations. Specifically, Counsel for the defendant needs additional time
9 for forensic investigation of discovery and to meet with the client to discuss the details prior to
10 proceeding forensic investigation of discovery and meet with the client to discuss the details
11 prior to proceeding.

12 3. Defendant is incarcerated and does not object to a continuance.

13 4. Both parties agree to the continuance.

14 5. Additionally, denial of this request for continuance could result in a miscarriage
15 of justice.

16 This is the ninth request for continuance filed herein.

17 DATED this 20th day of March 2020.

18
19 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

20
21 */s/ Rebecca Levy*
By _____
22 REBECCA LEVY
23 Assistant Federal Public Defender

/s/ Christopher Burton
By _____
CHRISTOPHER BURTON
Assistant United States Attorney

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
MAR 20	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	DEPUTY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
v.
JIMMY CARTER KIM,
Defendant.

Case No. 2:18-mj-836-DJA

ORDER

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
March 27, 2020 at the hour of 4:00 p.m., be vacated and continued to July 10, 2020
at the hour of 4:00 p.m.

DATED this 20th day of March 2020



UNITED STATES MAGISTRATE JUDGE